

Exhibit “D”

Law Offices
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April 29, 2003

VIA U.S. MAIL & FACSIMILE: 513-287-3810

Ms. Jill Thompson O'Shea, Esq.
CINERGY SERVICES, INC.
139 East Fourth Street
Rm 25 AT II
P.O. Box 960
Cincinnati, OH 45201

Re: Bill Brantley, et al. v. Cinergy Corp.
Case No. C-1-01-378

Dear Jill:

This letter responds to your April 28, 2003 correspondence requesting supplementation of Plaintiffs' responses to Defendant Cinergy Corp.'s First Set of Interrogatories and Request for Production of Documents.

PLAINTIFF BILL BRANTLEY

Response to Request for Supplementation of Interrogatory No. 1: Please see Plaintiff Bill Brantley's Response to Interrogatory No. 1. In addition, the following response is provided. Plaintiff Bill Brantley is currently in the process of obtaining a list of the qualifications and/or a curriculum vitae of each expert witness named in Plaintiff's Response to Interrogatory No. 1 and will provide same as soon as the lists and/or curriculum vitae have been acquired.

Response to Request for Supplementation of Interrogatory No. 2: Please see Plaintiff Bill Brantley's Response to Interrogatory No. 2. In addition, the following response is provided. Plaintiff Bill Brantley is currently in the process of obtaining the present or last known address and telephone number of the individuals listed as non-expert witnesses in Plaintiff's Response to Interrogatory No. 2, subparts (t)-(ii), and will provide same as soon as the addresses and telephone numbers have been acquired.

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Response to Request for Supplementation of Interrogatory No. 4: Please see Plaintiff Bill Brantley's Response to Interrogatory No. 4.

Response to Request for Supplementation of Request for Production No. 1: Please see Plaintiff Bill Brantley's first document production. In addition, see Plaintiff Bill Brantley's second document production.

Response to Request for Supplementation of Request for Production No. 4: Please see Plaintiff Bill Brantley's first document production. In addition, see Plaintiff Bill Brantley's second document production.

Response to Request for Supplementation of Request for Production No. 8: Plaintiff Bill Brantley will produce all responsive documents.

Response to Request for Supplementation of Request for Production No. 9: Please see Plaintiff Bill Brantley's Response to Request for Production No. 9.

Response to Request for Supplementation of Request for Production No. 10: None of which Plaintiff Bill Brantley has knowledge at this time.

Response to Request for Supplementation of Request for Production No. 11: Please see Plaintiff Bill Brantley's first document production. In addition, see Plaintiff Bill Brantley's second document production.

Response to Request for Supplementation of Request for Production No. 12: None of which Plaintiff Bill Brantley has knowledge at this time.

Response to Request for Supplementation of Request for Production No. 13: Please see Plaintiff Bill Brantley's first document production. In addition, see Plaintiff Bill Brantley's second document production.

Response to Request for Supplementation of Request for Production No. 14: Please see Plaintiff Bill Brantley's first document production. In addition, see Plaintiff Bill Brantley's second document production.

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Response to Request for Supplementation of Request for Production No. 15: Please see Plaintiff Bill Brantley's first document production. In addition, see Plaintiff Bill Brantley's second document production.

Response to Request for Supplementation of Request for Production No. 18: Please see Plaintiff Bill Brantley's first document production. In addition, see Plaintiff Bill Brantley's second document production.

PLAINTIFF RODNEY JONES

Response to Request for Supplementation of Interrogatory No. 1: Please see Plaintiff Rodney Jones's Response to Interrogatory No. 1. In addition, the following response is provided. Plaintiff Rodney Jones is currently in the process of obtaining a list of the qualifications and/or a curriculum vitae of each expert witness named in Plaintiff's Response to Interrogatory No. 1 and will provide same as soon as the lists and/or curriculum vitae have been acquired.

Response to Request for Supplementation of Interrogatory No. 2: Please see Plaintiff Rodney Jones's Response to Interrogatory No. 2. In addition, the following response is provided. Plaintiff Rodney Jones is currently in the process of obtaining the present or last known address and telephone number of the individuals listed as non-expert witnesses in Plaintiff's Response to Interrogatory No. 2 and will provide same as soon as the addresses and telephone numbers have been acquired.

Response to Request for Supplementation of Interrogatory No. 4: None of which Plaintiff Rodney Jones has knowledge at this time.

Response to Request for Supplementation of Request for Production No. 1: Please see Plaintiff Rodney Jones's first document production. In addition, see Plaintiff Rodney Jones's second document production.

Response to Request for Supplementation of Request for Production No. 2: Please see Plaintiff Rodney Jones's first document production.

Response to Request for Supplementation of Request for Production No. 4: Please see Plaintiff Rodney Jones's first document production. In addition, see Plaintiff Rodney Jones's second document production.

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Response to Request for Supplementation of Request for Production No. 7: None of which Plaintiff Rodney Jones has knowledge at this time.

Response to Request for Supplementation of Request for Production No. 9: None of which Plaintiff Rodney Jones has knowledge at this time.

Response to Request for Supplementation of Request for Production No. 10: None of which Plaintiff Rodney Jones has knowledge at this time.

Response to Request for Supplementation of Request for Production No. 11: Please see Plaintiff Rodney Jones's first document production. In addition, see Plaintiff Rodney Jones's second document production.

Response to Request for Supplementation of Request for Production No. 12: None of which Plaintiff Rodney Jones has knowledge at this time.

PLAINTIFF TODD TOLBERT

Response to Request for Supplementation of Interrogatory No. 1: Please see Plaintiff Todd Tolbert's Response to Interrogatory No. 1. In addition, the following response is provided. Plaintiff Todd Tolbert is currently in the process of obtaining a list of the qualifications and/or a curriculum vitae of each expert witness named in Plaintiff's Response to Interrogatory No. 1 and will provide same as soon as the lists and/or curriculum vitae have been acquired.

Response to Request for Supplementation of Interrogatory No. 2: Please see Plaintiff Todd Tolbert's Response to Interrogatory No. 2. In addition, the following information is provided. The non-expert witnesses identified in Plaintiff Todd Tolbert's Response to Interrogatory No. 2 will testify in support of Plaintiff Todd Tolbert's claims of race discrimination against Cinergy Corp.

Response to Request for Supplementation of Interrogatory No. 4: Please see Plaintiff Todd Tolbert's Response to Interrogatory No. 4.

Response to Request for Supplementation of Interrogatory No. 8: Please see Plaintiff Todd Tolbert's Response to Interrogatory No. 8.

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Response to Request for Supplementation of Interrogatory No. 9: Please see Plaintiff Todd Tolbert's Response to Interrogatory No. 9. In addition, the following response is provided. Plaintiff is currently compiling a detailing accounting of his expenses incurred as a result of the incident(s) complained of in his Complaint.

Response to Request for Supplementation of Request for Production No. 1: Please see Plaintiff Todd Tolbert's first document production. In addition, see Plaintiff Todd Tolbert's second document production.

Response to Request for Supplementation of Request for Production No. 4: Please see Plaintiff Todd Tolbert's first document production. In addition, see Plaintiff Todd Tolbert's second document production.

Response to Request for Supplementation of Request for Production No. 7: None of which Plaintiff Todd Tolbert has knowledge at this time.

Response to Request for Supplementation of Request for Production No. 9: Please see Plaintiff Todd Tolbert's first document production. In addition, see Plaintiff Todd Tolbert's second document production.

Response to Request for Supplementation of Request for Production No. 10: None of which Plaintiff Todd Tolbert has knowledge at this time.

Response to Request for Supplementation of Request for Production No. 11: Please see Plaintiff Todd Tolbert's first document production. In addition, see Plaintiff Todd Tolbert's second document production.

Response to Request for Supplementation of Request for Production No. 12: Please see Plaintiff Todd Tolbert's first document production.

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PLAINTIFF ANTHONY MARTIN

Response to Request for Supplementation of Interrogatory No. 1: Please see Plaintiff Anthony Martin's Response to Interrogatory No. 1. In addition, the following response is provided. Plaintiff Anthony Martin is currently in the process of obtaining a list of the qualifications and/or a curriculum vitae of each expert witness named in Plaintiff's Response to Interrogatory No. 1 and will provide same as soon as the lists and/or curriculum vitae have been acquired. Plaintiff's expert witnesses will testify in support of Plaintiff Anthony Martin's claims of race discrimination against Cinergy.

Response to Request for Supplementation of Interrogatory No. 2: Please see Plaintiff Anthony Martin's Response to Interrogatory No. 2. In addition, the following response is provided. Plaintiff Anthony Martin is currently in the process of obtaining the last known address of the non-expert witnesses listed in his Response to Interrogatory No. 2 and will provide same as soon as they have been acquired. Plaintiff's non-expert witnesses will testify in support of Plaintiff Anthony Martin's claims of race discrimination against Cinergy Corp.

Response to Request for Supplementation of Interrogatory No. 4: Please see Plaintiff Anthony Martin's Response to Interrogatory No. 4.

Response to Request for Supplementation of Interrogatory No. 8: Please see Plaintiff Anthony Martin's Response to Interrogatory No. 8.

Response to Request for Supplementation of Request for Production No. 1: Please see Plaintiff Anthony Martin's first document production. In addition, see Plaintiff Anthony Martin's second document production.

Response to Request for Supplementation of Request for Production No. 4: None of which Plaintiff Anthony Martin has knowledge at this time.

Response to Request for Supplementation of Request for Production No. 7: None of which Plaintiff Anthony Martin has knowledge at this time.

Response to Request for Supplementation of Request for Production No. 9: None of which Plaintiff Anthony Martin has knowledge at this time.

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Response to Request for Supplementation of Request for Production No. 10: None of which Plaintiff Anthony Martin has knowledge at this time.

Response to Request for Supplementation of Request for Production No. 11: None of which Plaintiff Anthony Martin has knowledge at this time.

Response to Request for Supplementation of Request for Production No. 12: Please see Plaintiff Anthony Martin's first document production. In addition, see Plaintiff Anthony Martin's second document production.

We apologize for the delay in responding to Defendant's request for supplemental answers to its first set of interrogatories and requests for production. Plaintiffs will supplement the answers provided herein as they acquire additional information.

Please do not hesitate to contact me with any questions, concerns, or requests for additional supplementation.

Very truly yours,



David W. Sanford

cc: Paul H. Tobias, Esq. (via facsimile)
David D. Kammer, Esq. (via facsimile)

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